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FCC 99-6

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

99-25 ✓

In the matter of:)
)
MM Docket 95-25)
FCC 99-6)
Proposed Low-Power FM Service)

Trident Media and Broadcasting, Ltd., an Illinois corporation, respectfully submits the following comments regarding the proposed Low-Power FM (LPFM) radio broadcasting service.

Trident Media and Broadcasting, Ltd. supports the establishment of the proposed LP1000 and LP100 FM broadcasting services, and would support the establishment of a microradio broadcasting service for 1- to 10-watt FM radio stations. Trident agrees with the Commission on the notion that an LPFM broadcasting service will promote community-oriented radio and diversity in voices and programming, as well as new radio ownership.

Trident supports the Commission's proposal to establish minimum distance separation requirements to prevent interference between LPFM stations and full-power FM stations. Additionally, Trident supports the Commission's proposal to require co-channel and first adjacent channel separation, and agrees that second and third adjacent channel separations are unnecessary due to the low power levels of LPFM stations.

Trident responds to concerns regarding the possibility of adverse effects of LPFM radio on future digital radio

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developments by stating that, given the appropriate measures to eliminate objectionable interference, LPFM stations would not pose a threat to In Band On Channel Digital Audio Broadcasting. Furthermore, Trident states that, while keeping pace with technology is important for the communications industry, as well as the nation at large, it is the public that is suffering because of the lack of localism in radio, and that filling that void for the listeners should be the top priority of the industry.

Trident agrees with the Commission's intent to require LP1000 stations to follow the same general rules applicable to full-power stations, and agrees that imposing the same rules on LP100 stations and microradio stations would be an unreasonable burden on such stations.

Trident strongly agrees with the Commission that LPFM stations should not be allowed to retransmit programming from full-power stations, but would suggest that microradio stations with power levels from 1 to 10 watts be allowed to either originate programming or act as translators for LP1000 or LP100 stations. Trident does not and will not propose that any LPFM station, including microradio, be permitted to rebroadcast the signals of full-power stations.

Trident proposes that the Commission allow LPFM radio stations to generate revenue commercially if they so desire. Given that one of the main concerns of LPFM proponents is that the industry has been closed to individuals and other

entities with "inadequate" finances, prohibition of commercially-generated revenue would be highly unreasonable and extremely detrimental to the execution and survival of the LPFM service. However, Trident also suggests that LPFM stations be made available to not-for-profit organizations to operate noncommercially, but that such stations should be restricted to the standard band of frequencies reserved for noncommercial use, except in cases where no channel is available in the noncommercial band, so as to preserve the commercial frequencies for their intended uses.

Trident is in complete agreement with the Commission that opportunities for diversity and new ownership should be preserved with the LPFM service. Trident suggests that the Commission would allow the owners of Part 15 radio stations and low-power television stations to own LPFM stations if they so desire, but that licensees of full-power stations be prohibited from LPFM ownership. Trident agrees, in any case, that new entrants into broadcasting be given a preference.

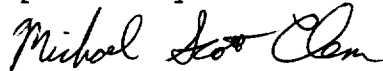
Trident stands with the Commission's intent to place ownership restrictions on LPFM stations, but suggests that any proposed national ownership limit on LPFM stations by any one entity be placed at 15 stations. Trident agrees that no entity be allowed to own more than one LPFM station in the same community.

Trident proposes that the Commission initiate a first-

come, first-served procedure for the filing of applications and the grant of construction permits for LPFM stations. Trident feels that this procedure would ensure that LPFM facilities could be easily acquired by knowledgeable local broadcasters who understand the needs of the community they propose to serve and who, at the same time, are knowledgeable of the measures necessary to protect the integrity of the FM spectrum. Furthermore, this procedure would eliminate the possibility of troublesome situations wherein mutually exclusive applications would require auctions for resolution, clogging the system, burdening the Commission and lengthening a community's time without local radio service.

In full support of the Commission's efforts to implement the proposed LPFM radio service, Trident respectfully submits the foregoing comments and suggestions for its review.

Respectfully Submitted,



Michael Scott Clem
President

Trident Media and Broadcasting, Ltd.

14 February 1999

In reply refer to:

Michael Scott Clem
1188 Pershing Road
West Frankfort, IL 62896-4807

(618) 937-4231